

1 JULIAN HAMMOND (SBN 268489)
 2 jhammond@hammondlawpc.com
 3 ARI CHERNIAK (SBN 290071)
 4 acherniak@hammondlawpc.com
 5 POLINA BRANDLER (SBN 269086)
 6 pbrandler@hammondlawpc.com
 7 HAMMONDLAW, P.C.
 8 1201 Pacific Ave, 6th Floor
 9 Tacoma, WA 98402
 10 (310) 601-6766 (Tel.)
 11 (310) 295-2385 (Fax)

12 FRANK S. HEDIN (SBN 291289)
 13 fhedin@hedinllp.com
 14 HEDIN LLP
 15 1395 Brickell Ave, Suite 610
 16 Miami, Florida 33131
 17 (305) 357-2107 (Office)
 18 (305) 200-8801 (Fax)

19 *Counsel for Plaintiffs and the Putative Classes*

20
UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

21
JONATHAN HOANG TO; JEFFRY HEISE;
 22 and **JOSEPH MULL**, individually and on behalf
 23 of all others similarly situated,

24 Plaintiffs,

v.
 25
DIRECTTOU, LLC; and ALLIANCE
 26 **ENTERTAINMENT, LLC**, Delaware Limited
 27 Liability Companies,

28 Defendants.

29 Case No. 3:24-CV-06447-WHO

30
[PROPOSED] ORDER GRANTING
MOTION TO APPOINT
HAMMONDLAW, P.C. AND HEDIN
LLP AS INTERIM CO-LEAD CLASS
COUNSEL

31
 Judge: Hon. William H. Orrick
 32 Courtroom: 2 – 17th Floor
 33 Hearing Date: April 9, 2025
 34 Hearing Time: 2:00 p.m.

1 Before the Court is Plaintiffs' Motion for Appointment of HammondLaw P.C. and Hedin L.L.P.
 2 as Interim Co-lead Class Counsel. Having considered the submissions of the parties, the arguments
 3 made at the hearing, and the relevant law, Plaintiffs' motion is GRANTED. The Court APPOINTS
 4 HammondLaw P.C. and Hedin LLP as Interim Co-lead Class Counsel.

5 Fed. R. Civ. P. 23(g)(1)(B) provides the following factors for the Court to consider: (i) the work
 6 counsel has done in identifying or investigating potential claims in the action; (ii) counsel's experience
 7 in handling class actions, other complex litigation, and the types of claims asserted in the action; (iii)
 8 counsel's knowledge of the applicable law; (iv) the resources that counsel will commit to representing
 9 the class; and (v) any other matter pertinent to counsel's ability to fairly and adequately represent the
 10 interests of the class.

11 Each of these factors favor the appointment of HammondLaw and Hedin LLP as Interim Co-
 12 Lead Class Counsel. HammondLaw and Hedin LLP have done substantial original work identifying and
 13 investigating potential claims in the action. *See* Fed. R. Civ. P. 23(g)(1)(A)(i). HammondLaw and Hedin
 14 LLP have significant levels of experience handling class actions and claims of the type asserted in this
 15 case. *See* Fed. R. Civ. P. 23(g)(1)(A)(ii); Fed R. Civ. P. 23(g)(1)(A)(iii). HammondLaw and Hedin LLP
 16 have sufficient resources to vigorously litigate on behalf of the putative classes, as has been
 17 demonstrated by prior cases that both firms have successfully litigated on a contingency basis. Fed. R.
 18 Civ. P. 23(g)(1)(A)(iv). Finally, HammondLaw and Hedin LLP will effectively and efficiently represent
 19 the putative classes and are committed to ensuring that a diverse set of attorneys work on this matter.
 20 *See* Fed. R. Civ. P. 23(g)(1)(B). For all these reasons, **IT IS HEREBY ORDERED THAT:**

21 1. Pursuant to Federal Rule of Civil Procedure 23(g)(3), the Court appoints HammondLaw
 22 and Hedin LLP as Interim Co-Lead Class Counsel.

23 2. Interim Co-Lead Class Counsel shall be responsible for the overall conduct of the
 24 litigation, shall be generally responsible for coordinating the activities of the putative classes, and shall

have the sole authority to:

a. determine and present to the court and opposing parties the position of the putative classes on all matters arising during the proceedings;

b. coordinate the conduct of discovery on behalf of the putative classes consistent with the requirements of Federal Rule of Civil Procedure 26, including the preparation of joint interrogatories, requests for production of documents, requests for admission, and the examination of witnesses in depositions;

- c. conduct settlement negotiations on behalf of the putative classes;
- d. consult with and employ experts and consultants as necessary;
- e. enter into stipulations with opposing counsel as necessary for the conduct of the litigation;

f. maintain adequate time records covering services rendered as Interim Co-Lead Class Counsel; and

g. perform all other duties as may be proper.

h. This order shall apply to all class actions related, transferred, or coordinated to the above-captioned action.

IT IS SO ORDERED.

Dated: _____

William H. Orrick
United States District Judge